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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH EDWARD GREENLAND,

Defendant.

Case No. 2:21-cr-160-APG-VCF

**Stipulation to Extend Deadlines
Regarding Defendant's Motion (Third
Request)**

It is hereby stipulated and agreed, by and between Christopher Chiou, Acting United States Attorney, through Jim W. Fang, Assistant United States Attorney, and Ronald Daniel Hedding, Esq., counsel for defendant, that defendant's deadline to file a reply to the government's response of defendant's Motion to Suppress Evidence, ECF No. 63, currently set for November 1, 2021, be extended until November 15, 2021.

1. Defendant filed his Motion to Suppress Evidence on September 3, 2021, and the parties agreed to extend the government's response deadline to October 25, 2021 due to government counsel's involvement in the preparation of trial of an unrelated matter, and difficulty locating the arresting officer, both with defense counsel's gracious consent.

1 2. The government filed the response on October 25, 2021. In addition to the
2 response, the government produced to defense new evidence it discovered in the course of
3 investigating and preparing for the response.

4 3. The parties agree that with the production of new evidence which is relevant
5 to the motion, defense needs additional time in order to properly prepare a comprehensive
6 reply.

7 4. As such, the parties respectfully ask this Court to grant a two-week extension,
8 or until November 15, 2021, for defendant to file a reply to the government's response of
9 defendant's motion to suppress.

10 DATED this 29th day of October, 2021.

11 CHRISTOPHER CHIOU
12 Acting United States Attorney

13 s/ Jim W. Fang
JIM W. FANG
14 Assistant United States Attorney
Counsel for the United States

s/ Ronald Daniel Hedding
RONALD DANIEL HEDDING, ESQ.
Counsel for Defendant

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:21-cr-160-APG-VCF

4 Plaintiff,

5 v.

6 KENNETH EDWARD GREENLAND,

7 Defendant.

8 **ORDER**

9 Based on the pending Stipulation between the defense and the government, and good
10 cause appearing therefore, IT IS HEREBY ORDERED that defendant's reply to the
11 Government's response to defendant's Motion to Suppress Evidence, ECF No. 63, shall be
12 filed and served on or before November 15, 2021.

13 DATED this 29th day of October, 2021.

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16 HONORABLE CAM FERENBACH
17 UNITED STATES MAGISTRATE JUDGE
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